

REMARKS

Claims 1-41 are currently pending in the present application. In an office action dated March 30, 2004, claims 1-13, 16-17, and 19-41 were rejected and claims 14, 15, and 18 were objected to. In the present response, Applicants amend claims 22, 26, and 27, cancel claims 24, 29, and 30, and traverse the rejections as follows.

Rejections under 35 U.S.C. 102

Claims 1-6, 8-13, 16, 17, 19-33 and 35-41 were rejected under 35 U.S.C. 102(e) as being anticipated by Angwin et al. (WO 00/41416). It was alleged that Angwin teaches all of the features of the rejected claims. Specifically, it was alleged that Angwin teaches a "data recognizer that differentiates the voice data from the non-voice data" on page 8, lines 38-43, and "a controller" for switching between two internet protocols, "according to the differentiation by the data recognizer" (page 8, lines 38-43, and page 14, lines 1-23).

Applicants do not believe that Angwin teaches these limitations, found in claims 1, 22, 31, and 32. Angwin teaches a mobile communication system that transmits IP-based voice packets and control data over a single circuit-switched connection. Angwin discusses the use of an Interworking Function (IWF) which "converts between the data transfer protocols of fixed telephone lines and of wireless communications" (Angwin, page 8, lines 39-40). The IWF referenced in Angwin does not "differentiate" different types of data, i.e., voice data from non-voice data. It simply converts voice packets from "telephone lines" to a format suitable for over-the-air transmission to a wireless telephone. Applicants believe that this distinction alone renders Angwin unable to sustain a rejection under 35 U.S.C. 102.

In addition, Applicants believe that Angwin does not teach a controller for switching between two internet protocols. The section cited in the office action mentions nothing about switching between two internet protocols, let alone performing the switching based on results from the "data recognizer". Applicants can find nothing in Angwin that include the features found in Applicants' claims.

Therefore, Applicants respectfully request the rejections to the independent claims, and their dependent claims, be withdrawn.

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